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*Counsel for Movant the Twitter Investor Group*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

KHAN M. HASAN, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

TWITTER, INC., JACK DORSEY, and  
NED SEGAL,

Defendants.

Case No.: 4:19-cv-07149-YGR

**CLASS ACTION**

**DECLARATION OF LAURENCE D.  
KING IN SUPPORT OF THE TWITTER  
INVESTOR GROUP'S MOTION FOR  
CONSOLIDATION OF ACTIONS,  
APPOINTMENT AS LEAD PLAINTIFF,  
AND APPROVAL OF CO-LEAD  
COUNSEL**

Judge: Hon. Yvonne Gonzalez Rogers  
Courtroom: 1, 4<sup>th</sup> Floor  
Date: February 4, 2020  
Time: 2:00 p.m.

[Additional Caption Below]

1 KHAFRE BARCLIFT, on behalf of himself and  
2 all other similarly situated

3 Plaintiff,

4 v.

5 TWITTER, INC., JACK DORSEY, and NED  
6 SEGAL,

7 Defendants.

Case No.: 5:19-cv-07992-BLF

8 I, Laurence D. King, hereby declare as follows:

9 1. I am a partner at the law firm of Kaplan Fox & Kilsheimer LLP. I respectfully submit  
10 this Declaration in Support of the Twitter Investor Group's Motion for Consolidation of Actions,  
11 Appointment as Lead Plaintiff, and Approval of Co-Lead Counsel. If called as a witness, I could  
12 and would competently testify thereto to all facts within my personal knowledge.

13 2. Attached hereto as Exhibit 1 is a true and correct copy of the October 30, 2019 Notice  
14 of Pendency of this Class Action on *PR Newswire* in connection with the filing of *Hasan v. Twitter,*  
15 *Inc.*, No. 19-cv-07149.

16 3. Attached hereto as Exhibit 2 is a true and correct copy of the sworn certifications of  
17 Thomas Do, Michael J. Conroy, and Richard Slepko, pursuant to the Private Securities Litigation  
18 Reform Act of 1995.

19 4. Attached hereto as Exhibit 3 is a true and correct copy of the signed Joint Declaration  
20 of Thomas Do, Michael J. Conroy, and Rich Slepko in Support of the Twitter Investor Group's  
21 Motion for Consolidation of the Actions, Appointment as Lead Plaintiff, and Approval of Co-Lead  
22 Counsel.

23 5. Attached hereto as Exhibit 4 is a true and correct copy of the chart calculating the  
24 losses incurred by the Twitter Investor Group.

25 6. Attached hereto as Exhibit 5 is a true and correct copy of the firm resume of Kaplan  
26 Fox & Kilsheimer LLP.

27 7. Attached hereto as Exhibit 6 is a true and correct copy of the firm resume of Levi &  
28 Korsinsky, LLP.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing  
2 is true and correct.

3 Executed this 30th day of December 2019, at Oakland, California.

4 /s/ Laurence D. King  
5 Laurence D. King